

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CYNTHIA DONALD,)	
)	Case No. 20 cv 6815
Plaintiff,)	
v.)	Hon. Elaine E. Bucklo
)	
CITY OF CHICAGO <i>et al.</i> ,)	Magistrate Judge Jeffrey Cole
)	
Defendants.)	

JOINT STATUS REPORT

Plaintiff Cynthia Donald and Defendants City of Chicago and Eddie Johnson, through their respective counsel, submit this joint status report pursuant to the Court's Order dated August 2, 2022 (Dkt. # 160).

1. CASE STATUS

A. Attorneys of record for each party

For Plaintiff Cynthia Donald:

Robert McLaughlin
Carter Grant
Hart McLaughlin & Eldridge, LLC
22 West Washington, Suite 1600
Chicago, IL 60602
312-955-0545
rmclaughlin@hmelegal.com
cgrant@hmelegal.com

For Defendant City of Chicago:

Mark Bereyso
Kristen Woytowicz
Matthew Suhl
City of Chicago Law Department
2 N. LaSalle St. Suite 640
Chicago, IL 60602
312-744-6951
mark.bereyso@cityofchicago.org
kristen.woytowicz3@cityofchicago.org
matthew.suhl@cityofchicago.org

For Defendant Eddie Johnson:

Michael Leonard
Leonard Trial Lawyers, LLC
120 North LaSalle St., Suite 2000
Chicago, Illinois 60602
(312)380-6659
mleonard@leonardtriallawyers.com

B. Status of Discovery

- a. All fact and expert discovery has been completed.

C. Jury demand and the estimated length of the trial

All parties have requested a jury on claims so triable. The parties anticipate a trial of approximately two weeks.

2. Pending Motions

There are no pending motions.

Defendants City of Chicago and Eddie Johnson expect to file motions for summary judgment on all claims. Due to planned holidays as well as a personal family medical matter of defense counsel, the City requests through March 31, 2023 for the parties to file any dispositive motions.

3. SETTLEMENT

A. Status of settlement discussions

The parties have not engaged in settlement discussions.

B. Settlement conference

The parties do not believe a settlement conference would be productive at this time.

4. CONSENT TO PROCEED BEFORE A MAGISTRATE JUDGE

The parties do not consent to proceed before a Magistrate Judge.

Dated: December 20, 2022

/s/ Robert J. McLaughlin

Robert J. McLaughlin
Carter D. Grant
Hart McLaughlin & Eldridge, LLC
22 West Washington, Suite 1600
Chicago, Illinois 60602
rmclaughlin@hmelegal.com
cgrant@hmelegal.com
Counsel for Plaintiff

/s/ Mark J. Bereyso

Mark J. Bereyso
Kristen Woytowicz
Matthew Suhl
City of Chicago, Department of Law
2 North LaSalle Street, Suite 640
Chicago, Illinois 60602
mark.bereyso@cityofchicago.org
kristen.woytowicz3@cityofchicago.org
matthew.suhl@cityofchicago.org
Counsel for Defendant City of Chicago

/s/ Michael I. Leonard

Michael I. Leonard
Leonard Trial Lawyers, LLC
120 North LaSalle Street, Suite 2000
Chicago, Illinois 60602
mleonard@leonardtriallawyers.com
Counsel for Defendant Eddie Johnson